

CERTIFIED TRANSLATION

Commonwealth of Puerto Rico
Court of First Instance
San Juan Superior Part

EXHIBIT 18

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY
Appealed

Vs.

LUIS A. MERCADO JIMENEZ ET AL
Petitioners

CIVIL NO: T.A. KLCE2018-01384

TPI: KEF 2011-0240 (1003)

FORCED EXPROPRIATION

ANSWER TO CERTIORARI

To the Honorable Court:

COMES NOW The Puerto Rico Highways and Transportation Authority, through the undersigned legal representation and before this Honorable Court very respectfully states, informs, and prays:

1. The appealed party does not object to the issuance of the Writ of Certiorari, as requested by petitioner herein.
2. The appealed party does not object to the authorization of the disbursement of the funds corresponding to the participations of Adrián Mercado Jiménez, Teresa Vizcarondo Toro and their conjugal partnership corresponding to both in plots 021-01 and 021-04.
3. We agree with petitioner regarding the Bankruptcy Court partially lifting the stay only for the purpose of submitting a stipulation between them and the appealed party herein for the payment of the amount agreed to by stipulation.
4. We understand that the Honorable Judge Leticia Ortiz has jurisdiction to pass judgment on the stipulation that was submitted and that the same only refers to the appealed party and petitioners herein.
5. We accept that, in this case, there are no other parties requesting any remedies in the Bankruptcy court nor in the Court of First Instance.
6. The appealed party herein submitted all documents required by the CFI (TPI) that support the reason why petitioners herein are creditors of the additional consigned sum.
7. No controversies remain between the appealed party herein and petitioners herein.
8. The only pending matter in this case is to clarify that the non-stoppage permitted by the Bankruptcy Court in this case is only partial and is limited to the content of the stipulation that was submitted and the consignment of the corresponding additional sum only in the participation of petitioners herein on

 I, Juan E. Segarra, USCCI #06-067/translator, certify that the foregoing is a true and accurate translation, to the best of my abilities, of the document in Spanish which I have seen.

CERTIFIED TRANSLATION

plots 021-01 and 021-04.

In view of the above we request from this Court clarification that lifting the stay permitted by the Bankruptcy Court only regards petitioner's interest herein, and that the Court of First Instance has jurisdiction to attend in the stipulation that was submitted before the Highways and Transportation Authority and petitioners herein and allows the disbursement of funds and that final judgment can be entered regarding petitioners herein.

I CERTIFY: Having sent a true and exact copy of this motion to: Adrián Mercado Jiménez, Esq. at: amercado@mercadosotolaw.com; Rodolfo Gluck Figueroa, Esq. at: lcdogluck@gmail.com; Ricardo Pascual Villaronga, Esq. at: ripascual36@gmail.com; Juan E. Perez Reilly, Esq. at: perezlaw@coqui.net; Randolph Raldiris Dominicci, Esq. at: lcderaldiris@yahoo.com; Isis N. Ramirez Salcedo, Esq. at: isisramirezlaw@gmail.com; Samuel Torres Cortes, Esq. at: torrescosta@hotmail.com.

In San Juan, Puerto Rico, on October 10, 2018.

s/ signature not legible
Anita Cortés Centeno, Esq.
Bar Member Number: 11,368
PO Box 42007
San Juan, PR 00940-2007
787-721-8787 Ext. 1228

6407/ACC/vfs

 I, Juan E. Segarra, USCCI #06-067/translator, certify that the foregoing is a true and accurate translation, to the best of my abilities, of the document in Spanish which I have seen.